



London N. Breed
Mayor

Department of Emergency Management
1011 Turk Street, San Francisco, CA 94102
Phone: (415) 558-3800 | Fax: (415) 558-3843



Mary Ellen Carroll
Executive Director

August 26, 2019

Michael J. Wilhelm
Chief, Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission (FCC)
445-12th Street, SW
Washington, D.C. 20554

RE: San Francisco Department of Emergency Management application for FCC Rule Waiver

Dear Mr. Wilhelm:

The San Francisco Department of Emergency Management (DEM) is requesting an FCC Rule Waiver for an exemption from 47 CFR, Part 10 and 47 CFR, Part 11 rules (Waiver). We are seeking the Waiver to allow the execution of a special test of the Wireless Emergency Alert (WEA) System to test the system. The geographic area of the test will be within the City and County of San Francisco.

The Cities of Oakland and San Diego recently conducted tests to determine the feasibility to use the Integrated Public Alert and Warning System (IPAWS) WEA alert system on a countywide basis. The City and County of San Francisco requests permission to conduct a WEA live code test on Thursday, October 17, 2019 at 5:04 PM. The purpose of the test is to: 1) test San Francisco's ability to execute a Wireless Emergency Alert; and, 2) promote earthquake safety and preparedness while leveraging the 30th anniversary of the 1989 Loma Prieta earthquake.

There is up to a 99 percent probability that a magnitude 6.7 or higher earthquake will occur within the state anytime within the next 30 years. Effective alerts and warnings are a critical emergency management tool to help prevent hazards from becoming disasters by empowering residents to make informed decisions and take action to save lives and reduce property losses thus enabling quicker recovery. Without this waiver, critical live testing cannot be conducted to evaluate the current capability of WEA within the City and County of San Francisco.

The proposed text of the test will read:

TEST*SF Wireless Emergency Alert test. 30 yrs since '89 quake. Prepare @
www.sf72.org*TEST

As part of this test, DEM will implement a comprehensive WEA Live Code Test outreach program to include the following elements:

1. DEM will conduct a conference call with members of the Cellular Telecommunications Industry Association to discuss the nature of the test, coordinate actions with wireless providers to administer the test, and gather input to improve the test design.
2. DEM will inform neighboring jurisdictions whose communities may receive the test message due to bordering proximity to the City and County of San Francisco.
3. DEM will ensure its 9-1-1 Dispatch Center is fully aware of the test and that first responders, including the California Highway Patrol, are equipped to inform stakeholders and general public that the activity is only a test.
4. DEM will conduct a stakeholder call with local, state, federal and private partners in San Francisco to announce the test, communicate information, answer questions, facilitate local participation and solicit feedback.
5. DEM will develop a general public-targeted communications strategy to inform all stakeholders about the test. The strategy will leverage social and traditional media in the weeks leading up to the test including outreach to local broadcasters and newspapers; hosting an in-person media event during the ShakeOut earthquake drill; and cross promotion through partner social media and public service digital platforms including but not limited to www.sfgov.org and www.sf311.org.

DEM will provide the FCC with a detailed account of any problems that occur in the distribution of the WEA test message, in addition to a post-test analysis. If you have any questions, or wish to discuss further, please contact my Chief of Staff, Adrienne Bechelli, at Adrienne.Bechelli@sfgov.org or 415-558-3810. Thank you for your consideration.

Sincerely,



Mary Ellen Carroll
Executive Director

cc: London N. Breed, Mayor
Sean Elsbernd, Mayor's Chief of Staff
Bijan Karimi, DEM Acting Deputy Director, Division of Emergency Services
Adrienne Bechelli, DEM Chief of Staff